

**REMARKS**

Claims 1-3, 9-14, and 21 are pending in this application. By this Amendment, claims 1, 9, and 21 are amended. This Amendment is supported by the specification at least at paragraphs [0012], [0030], [0031], [0047], [0048], [0057]-[0059], and Figs. 1 and 6. No new matter is added.

Entry of the amendments is proper under 37 CFR §1.116 because the amendments: (a) place the application in condition for allowance (for the reasons discussed herein); (b) do not raise any new issue requiring further search and/or consideration (as the amendments amplify issues previously discussed throughout prosecution); (c) satisfy a requirement of form asserted in the previous Office Action; (d) do not present any additional claims without canceling a corresponding number of finally rejected claims; and (e) place the application in better form for appeal, should an appeal be necessary. The amendments are necessary and were not earlier presented because they are made in response to arguments raised in the final rejection. Entry of the amendments is thus respectfully requested.

The courtesies extended to Applicant's representative by Examiner Mr. Sean Motsinger at the interview held on May 4 are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicants' record of the interview.

**I. Rejection of Claims Under 35 U.S.C. §112**

The Office Action rejects claims 1-3, 9-14, and 21 under 35 U.S.C. §112, first paragraph, as allegedly failing to comply with the written description requirement. Applicants respectfully traverse this rejection with the following amendments.

Claims 1, 9, and 21 are amended to replace "external source" with "data source." This amendment is supported by the specification at least at paragraphs [0030] and [0047].

Claim 21 is amended to replace "text plane" with "selector plane" to provide a proper antecedent basis. This amendment is supported by the specification at least at paragraph [0012] and Fig. 1.

Claim 9 is further amended to clarify that the converter, segmentor, first compressor and second compressor are implemented in hardware or software. This amendment is supported by the specification at least at paragraphs [0057]-[0059].

Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1-3, 9-14, and 21 under 35 U.S.C. §112.

## **II. Rejection of Claims Under 35 U.S.C. §103(a)**

The Office Action rejects claims 1, 2, 9, 10, and 12-14 under 35 U.S.C. §103(a) over Zapan (U.S. Patent No. 6,343,159) in view of Fan (U.S. Patent No. 6,400,844); and claims 3, 11, and 21 under 35 U.S.C. §103(a) over Zapan in view of Fan and in further view of Ferman (U.S. Patent No. 7,379,594). Applicants respectfully traverse these rejections.

In particular, Applicants respectfully submit that Fan does not disclose or render obvious the program including at least the step of reducing only resolution of the low spatial frequency gray scale image data to generate scaled low spatial frequency gray scale image data in the second plane, as recited in independent claim 1, and similarly recited in independent claims 9 and 21.

The Office Action, on page 8, asserts that Fan discloses scaling the gray scale image data in the background plane (see col. 5, lines 15-25 of Fan). As mentioned during the personal interview, in Fan, scaling of resolution is applied to both foreground and background planes: "[t]he pixel map is decomposed into a three-plane representing — a reduced-resolution foreground plane, a reduced-resolution background plane, and a high-resolution binary selector plane" (see col. 1, lines 44-46 of Fan), and "[t]he upper and lower planes are stored at the same bit depth and number of colors as the original pixel map 10, but possibly at

reduced resolution" (see col. 5, lines 17-19 of Fan). In comparison, reducing resolution applies only in the second plane, as recited in claim 1, and similarly recited in claim 9 and claim 21 ("the background plane"). Thus, Fan does not disclose or render obvious reducing only resolution of the low spatial frequency gray scale image data to generate scaled low spatial frequency gray scale image data in the second plane, as recited in claim 1 and similarly recited in claim 9; and scaling the gray scale image data only in the background, as recited in independent claim 21. Other references, Zapan and Ferman, either alone or in combinations, do not disclose or render obvious the above-noted feature.

Therefore, Applicants respectfully assert that independent claims 1, 9, and 21 are allowable. Claims 2 and 3 depend from claim 1; and claims 10-14 depend from claim 9, and are therefore also allowable by virtue of their dependence, as well as for the additional features that they recite. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1-3, 9-14, and 21 under 35 U.S.C. §103(a).

### **III. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-3, 9-14, and 21 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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